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Hearing Date: November 21 , 2000 @ 10:00 A.M.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11
RANDALL'S ISLAND FAMILY GOLF :
CENTER, INC., : Case No. 00-41065 (SMB)
Debtor. :
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**OBJECTION OF NEW ROC ASSOCIATES, L.P. TO
DEBTOR'S OMNIBUS MOTION**

**TO THE HON. STUART M. BERNSTEIN,
UNITED STATES CHIEF BANKRUPTCY JUDGE:**

New Roc Associates, L.P. ("New Roc") by its attorneys, Del Bello Donnellan Weingarten
Tartaglia Wise & Wiederkehr, LLP, for its objection to the Debtors' omnibus motion respectfully
represents:

1. The Debtors filed voluntary Chapter 11 cases on May 4, 2000. The Debtors continue to operate their business and to manage their properties pursuant to Bankruptcy Code Sections 1107 and 1108. No trustee has been appointed in these reorganization cases.
2. New Roc opposes the management agreement between the Debtors and Zolfo Cooper

Management, LLC (“Zolfo”). As set forth in the motion, the proposed management agreement between the Debtors and Zolfo would transfer control of the Debtors to Zolfo. The appointment of Zolfo to key management positions is distressing, and it raises grave questions as to whether these Debtors are capable of conducting a successful reorganization. Furthermore, the need to enter into the key employee retention program raises additional doubts as to whether management has the confidence and ability to successfully reorganize these Debtors. The motion raises numerous consequential issues; however, it provides few answers to consequential issues.

3. If the Debtors’ current management is incapable of operating the Debtors, then a Chapter 11 Trustee should be appointed. These reorganization cases have been pending for more than six months. The landlords have been held at bay under the premise that these Debtors will successfully reorganize. Unfortunately, this motion creates the impression that these estates are in disarray.

4. It is respectfully represented that the motion should be denied.

WHEREFORE, the Objector respectfully requests that this Court deny the motion and grant such other and further relief as this Court deems just and equitable.

Dated: White Plains, New York
November 16, 2000

**DEL BELLO DONNELLAN WEINGARTEN
TARTAGLIA WISE & WIEDERKEHR, LLP**
Attorneys for **NEW ROC ASSOCIATES, L.P.**

By: /s/ Carlos J. Cuevas
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